

Cohen, Dippell and Everist, P.C.

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Implementing Section 503 of RAY BAUM’S Act)	WC Docket No. 18-335
Rules and Regulation Implementing the Truth in Caller ID Act of 2009)	WC Docket No. 11-39

Comments
on Behalf of
COHEN, DIPPELL AND EVERIST, P.C.

The following comments are submitted on behalf of Cohen, Dippell and Everist, P.C. (“CDE”) and is in response to the Notice of Proposed Rulemaking released by the Federal Communications Commission (“FCC”) on February 15, 2019. CDE and its predecessors have practiced before the FCC for over 75 years in broadcast and telecommunications matters. The firm or its predecessors have been located in Washington, DC since 1937 and performed professional consulting engineering services to the communication industry.

The undersigned is licensed as a Professional Engineer in the District of Columbia and has been in continuous employment with this firm or its predecessors for over fifty (50) years.

From her iPhone, AT&T provider, my secretary receives robocalls daily even after using the “block this caller/block contact” feature. These callers just use other numbers in the calling sequence. These call are received even though her number is listed on a “Do Not Call” list.

Attached are examples of random calls received by this office over the past several months. The office is served by a hard line so it is obvious that telephone numbers for wireless and hard line use are being used fraudulently. This office, several years ago, put itself on the no call list. It is our opinion that this has not served as any deterrent. Similarly, the fax line routinely receives unsolicited material promising treasures if certain steps are taken. It is obvious that the current situation is not under control, and is neither using common carrier regulated by the FCC nor wireless communications regulated by the FCC. We believe that the FCC is the proper agency to deal with this matter.

Therefore we urge the FCC to aggressively obtain the necessary legislation to curve this fraudulent activity as it is unwanted and annoying.

Respectfully Submitted,

COHEN, DIPPELL AND EVERIST, P.C.

A handwritten signature in black ink, appearing to read 'Donald G. Everist', with a long, sweeping horizontal stroke extending to the right.

Donald G. Everist
President

DATE: April 3, 2019

COHEN, DIPPELL AND EVERIST, P.C.

TABLE I
LANDLINE ROBOCALL TELEPHONE LOG
JANUARY 28, 2019 THROUGH APRIL 2, 2019

DATE	TIME	CALLER
1/28/19	PM	One tone
1/29/19	11:11 AM	Robocall - Medicare
1/30/19	2:56 PM	Human - Microwave Journal
1/31/19	11:19 AM	Comcast line - no one
	2:58 PM	Robocall - Comcast line - credit card
2/1/19	10:10 AM	Human - Police charity
2/4/19	9:44 AM	Human - Veterans donation
	5:28 PM	Robocall - Insurance
2/5/19	2:20 PM	Click - no one
2/6/19	11:30 AM	Robocall - Insurance
2/7/19	10:30 AM	No one
	4:55 PM	Robocall - Insurance
2/8/19	11:30 AM	Robocall - Insurance
	12:50 PM	stray call - no audio
	1:15 PM	stray call - intermittent tone
	2:20 PM	Robocall - Insurance
2/11/19	2:04 PM	No one
2/12/19	4:13 PM	Robocall - Cathrene - Microsoft
2/13/19	12:09 PM	One tone
	4:58 PM	Robocall - Lisa - Workers Comp Refund
2/14/19	10:30 AM	No One
	4:00 PM	One tone

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JANUARY 28, 2019 THROUGH APRIL 2, 2019

DATE	TIME	CALLER
2/15/19	5:11 PM	One tone
2/19/19	11:36 AM	Robocall - Medicare
2/19/19	2:12 PM	Robocall - Google
2/19/19	2:48 PM	Robocall - Tracy - Medical alert device
2/19/19	4:12 PM	Robocall - Google
2/21/19	9:46 AM	Robocall - Sara - Medical alert device
2/21/19	10:36 AM	Human - Police charity
2/21/19	3:47 PM	One tone
2/22/19	10:15 AM	Robocall - Sara - Medical alert device
2/22/19	10:40 AM	Robocall - Google
2/22/19 (3 calls, 2 disconnect) -0111, -0112, -0111	11:12 AM	Robocall - Rachel - Health Insurance
2/22/19 (2 calls, 1 disconnect) -0111, -1261	3 PM	Robocall - Nancy - Health Insurance
2/22/19	4:20 PM	One tone
2/25/19	10:15 AM	One tone
2/25/19	12:40 PM	No one (DGE)
2/25/19	1:12 PM	Robocall - Comcast line - Antivirus (DGE)
2/26/19	1:50 PM	No one
2/26/19	2 PM	Robocall - credit card
2/26/19	2:25 PM	One tone
2/26/19	4:25 PM	No one
2/27/19	9:50 AM	No one

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DATE	TIME	CALLER
2/27/19	12:59 PM	Robocall - Comcast line-credit card
2/27/19	2:27 PM	Comcast line - No one
2/27/19	3:40 PM	No one
2/27/19	4:45 PM	Robocall - Cathrene - Microsoft
2/28/19	10:20 AM	Robocall - Sara - Medical alert device
2/28/19	12:27 PM	Comcast line - No one
2/28/19	1:24 PM	No one
2/28/19	1:48 PM	No one
2/28/19	1:51 PM	No one
2/28/19	3:50 PM	Robocall - Christine - cancer donation
3/4/19	12:19 PM	No one
3/4/19	4:30 PM	No one
3/5/19	9:45 AM	Robocall - Verizon
3/5/19	11 AM	No one
3/5/19	11:15 AM	No one
3/5/19	1:55 PM (3 calls -0111)	No one
3/6/19	2:27 PM	Robocall - Nancy - Medicare
3/7/19	10:10 AM (2 calls)	No one
3/12/19	11:49 AM	Robocall - Elaine - Solar Power
3/12/19	1:25 PM	No one
3/13/19	2:44 PM	No one

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DATE	TIME	CALLER
3/13/19	4:45 PM	Robocall - Comcast line-credit card
3/15/19	12:19 PM	Tom Lewis - Veterans donation
3/18/2019	10:08 AM	No one
3/18/2019	2:08 PM	Robocall - Google
3/18/2019	2:15 PM	Human - Police charity
3/18/2019	5:20 PM	Robocall - Verify SSN
3/19/2019	12:28 PM	Robocall - Google - Credit rating
3/19/2019	12:30 PM (2 calls)	No one
3/20/2019	9:22 AM	No one
3/21/2019	4:30 PM	No one
3/21/2019	5:26 PM	No one
3/22/2019	8:56 AM 8:57 AM	No one (CL)
3/25/2019	1:22 PM	No one (DGE)
3/30/2019	1:31 PM (Line 1)	No one (DGE)
4/1/2019	12:50 PM (Line 1)	Dial tone (DGE)
4/1/2019	2:15 PM (Line 1)	No one (DGE)
4/1/2019	4:25 PM	Dial tone
4/2/2019	2:25 PM	No one